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		1/7/2004 – REVISED -Any issues prior to the day of the cut go through the ISC (Escalation Center). Qwest will provide CLEC status on completion of the batch via the new web-based status tool and will provide a timeframe prior to closing out the orders where the CLECs can call the ISC and work through issues associated with orders in the batch. This process will be documented in CLEC-facing documentation as a part of the Batch Hot Cut Process.		the CLEC personnel and the Qwest personnel will have different work functions and consequently there would not likely be synergies or benefits associated with joint training.	
P-27a	Level of Mechanization - status tool	See remarks in "History" column regarding commitment to develop web-based status tool	Qwest should develop an electronic system to provide real-time order status information (MCI – p. 5)	12/3/2003 - OPEN – Qwest is investigating this issue. 1/7/2004 – Qwest has committed to develop a status tool. Based on that commitment, MCI is willing to close this issue as it pertains to the status tool	1/7/2004 – CLOSED as to issue of providing a mechanized status tool and scheduling tool MCI agrees to close.
P-27b	Level of mechanization – electronic scheduling tool	See remarks in "History" column regarding Qwest's commitment to develop an electronic due date scheduling	Establish an on-line real time electronic due date scheduling reservation system that allows CLECs to select hot cut times and	12/3/2003 OPEN – Qwest is investigating this issue. 1/7/2004 – Qwest has committed to develop an electronic due date	1/7/2004 -AT&T agrees to close on the mechanization issue raised in the initial CLEC comments.

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		capability for batch hot cuts.	dates. (MCI - pp. 9-10)	scheduling reservation system that will permit CLECs to select hot cut dates. Based on that commitment, MCI is willing to close this issue as it pertains to the scheduling tool.	
P-27c	Level of mechanization - automated or robotic frames	<p>According to the International Engineering Consortium (IEC) on URL: http://www.iec.org/online/tutorials/frames/topic04.html</p> <p>There is no viable solution for robotic distribution frames at this time..</p> <p>"While simple in concept, this type of solution never quite matured into a viable technology for automating distribution frames. That is because pure mechanical, robotic solutions have reliability and maintenance issues due to their moving parts. This limits their effectiveness in larger COs or in environments where significant churn is experienced."</p> <p>"Perhaps the biggest "show stopper" for robotics, and all of the other copper automation technologies previously examined for frame applications, has been scalability."</p>	Automated or robotic frames should be evaluated (MCI - p. 3)	On the issue of automated or robotic frames -- see information in Qwest Position column.	12/19/2003 - IMPASSE as to the issue of evaluating automated or robotic frames.
P-28	Troubleshooting and	The process provides that	How does Batch Hot Cut process	12/17/2003 - Qwest Response - The	1/7/2004 - CLOSED - based on

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(See also P-17, 18 & 19)	acceptance of multiple loops – specifically, sufficiency of one-hour window to resolve trouble and to accept orders	CLECs are notified if there is trouble on a line within the Batch. The one-hour notification begins at the time that notice is provided. CLECs can also do work up-front to minimize the likelihood of trouble at the time of the cut.	address troubleshooting on multiple loops within the current one hour window provided? (Eschelon MN – p. 12) 12/19/2003 – Eschelon believes this is related to P-19 and, since Qwest has not yet closed on P-19, Eschelon disagrees that the 1-hour window is appropriate to resolve. (Eschelon – 12/19/2003 Forum) AT&T and MCI believe e-mail notification is inappropriate given that the CLEC only has a 1-hour window to resolve. MCI believes that this issue may be mitigated if there is some sort of on-line status tool made available to the CLECs. (AT&T & MCI – Forum)	CLEC is notified via email of trouble on the line(s). when the email is sent to the CLEC, the hour timeframe starts for the orders contained on the e-mail notification. The CLEC then has 1 hour to resolve the trouble(s) and provide information back to the QCCC. If no response, the QCCC follows the standard jeopardy process and the CLEC will need to supplement the LSR(s) with a new due date. 12/19/2003 – OPEN on 1-hour window– pending CLEC discussions to explore what an appropriate period may be. Also OPEN as to issue of method of notification. 1/7/2004 – Qwest counter-proposal as discussed in Issue P-17 eliminates the opportunity to cure on Due Date. AT&T, MCI, McLeod and Covad all agree that the opportunity to cure on due date can be eliminated.	Qwest counter-proposal as discussed at Issue P-17. 1/7/2004 - AT&T agrees to CLOSE. 1/7/2004 – MCI agrees to CLOSE 1/7/2004 – McLeod agrees to CLOSE 1/7/2004 – Covad agrees to CLOSE
P-29	Coordination of systems changes as a result of the Forum & State proceedings with CMP	For systems changes, the product of the Forum and the State Proceedings will go to CMP as Regulatory Change Requests. As such, the changes will be incorporated into releases above the line and will not be prioritized.	How will changes agreed to in the Forum be synched up with and incorporated into the CMP? (Lichtenberg – MCI – Forum)	12/10/2003 – OPEN 12/19/2003 - Qwest provided explanation that the CMP process for regulatory changes is for all CLECs and Qwest to vote to see if they agree that the systems changes are indeed a regulatory change. Qwest will agree to abide by the spirit and intent of the regulatory	1/7/2004 – IMPASSE – as to MCI issue regarding the need for any system changes coming out of the batch hot cut proceedings in the states to be classified as regulatory changes. MCI does not agree, in this situation, that the CMP process is the appropriate forum to address

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				<p>orders issued by state Commissions and the existing CMP processes as they pertain to the Batch Hot Cut process. MCI believes this issue needs to remain OPEN.</p> <p>1/7/2004 – Qwest proposes that this issue be resolved by stating that changes agreed to in this forum and ordered by state commissions will be incorporated into the CMP process as regulatory changes.</p> <p>1/8/2004 – McLeod concerned about system enhancements for BHC being included in the CMP given the number of Change Requests that are currently pending – McLeod position is that the enhancements associated with BHC should be moved outside CMP as a separate release.</p> <p>1/8/2004 – Covad recommends Qwest allocate additional resources to address systems issues associated with Triennial Review.</p> <p>1/8/2004 – It is Qwest's position that the changes that result from the TRO will be handled through the normal CMP process..</p>	<p>systems changes associated with Batch Hot Cut given that the systems changes must be in place in order for the Batch Hot Cut process to exist.</p>
P-30	Process flow – steps	Qwest cannot accommodate MCI's request because steps 3-9	On Exhibit 3 (Proposed Batch Hot Cut Provisioning Flow) MCI	<p>12/10/2003 – OPEN</p> <p>12/12/2003 – CLOSED - MCI</p>	<p>12/12/2003 – CLOSED - MCI agrees to close this issue</p>

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		are flow-through. Step 3 is the receipt of the LSR. The LSR would then need to be input into the SOP (Step 5), then designed (Step 9) before verification of the order by QCCC occurs (Step 10).	recommends that Qwest move step 10 (Order Verification/Qualification) to occur immediately after current step 3. There is no reason to proceed further if the order does not qualify for the BHC process (Gates – MCI – Forum)	agrees to close this issue.	
SCALABILITY – VOLUMES					
SC-1 (See also SC-5)	Can Qwest's proposed process handle anticipated volumes?	<p>The Batch Hot Cut process is scalable, which will allow Qwest to meet current and future demand.</p> <p>In considering volumes that may have to be handled by the Batch Hot Cut Process, Qwest has considered the embedded base as well as incremental growth similar to what AT&T has suggested. An additional assumption is that in the event there is a finding by state commissions of impairment, or in markets where Qwest does not seek to challenge the presumption of impairment, then Qwest will continue to provide UNE-P. All of these assumptions will form the basis for the volumes that can be anticipated.</p> <p>Qwest will be prepared in the near future to put forward</p>	<p>Qwest needs to provide more evidence to establish this point. (AT&T – p. 12)</p> <p>Qwest needs to identify the number of batches that it can handle per Central Office, per state and per region. (Eschelon – p. 17)</p> <p>Qwest must clarify the maximum/minimum line volumes per day per CLEC for the Batch Hot Cut (McLeod – p. 1)</p> <p>The daily line count threshold that Qwest can manage for its retail unit must be provided, and parity established. (McLeod – p. 2)</p> <p>Are there limitations on the number of UNE-P to UNE-L lines that can be migrated for a single account? (MCI – Forum)</p> <p>Clarify the relationship of and</p>	<p>12/3/2003 OPEN - For SC-1 in total, Qwest will take-back – providing parties with the assumptions that form the basis for its proposed volume estimates. Qwest will also provide additional information on assumptions for staffing levels for the anticipated volumes.</p> <p>Qwest is not placing limits on the number of UNE-P lines that can be migrated for a single account.</p>	1/7/2004 – IMPASSE as to whether Qwest's proposed process can handle anticipated volumes

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		numbers based on those assumptions.	<p>impact of batch process on non-batch orders and other services. (Eschelon MN p. 10)</p> <p>AT&T believes should assume worst case scenario for development of the process upper limit. AT&T thinks that adding an incremental growth number using analogous number e.g., customers will move their local service about as much as they move their long distance service approximately 2.6%. Churn for CLECs is approximately 4.6-5.2% Churn rate should also include winback rates for Qwest. AT&T concerned about Qwest's ability to handle volumes. Wants Qwest to share some of its analysis on why it believes it can keep up with the demand AT&T believes its appropriate to look at embedded base of UNE-P and UNE-L customers, add some incremental growth number to account for the churn, include additional staff to handle IDLC. and then explain how the process will handle. (AT&T – Forum)</p> <p>Scalability is an issue for McLeod and very interested in how Qwest will gear up for the volume.</p>		
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			(McLeod - Forum)		
SC-2	What is the impact of performing Batch Hot Cuts for multiple CLECs in same CO.	<p>In a given CO, Qwest will perform batch cuts for up to 100 lines. The 100 lines can be associated with one or more CLECs. This number is over and above the normal workload.</p> <p>1/7/2004 Qwest will work with multiple CLECs in the same central office if the sum of the CLECs batches does not exceed 100 lines.</p> <p>Today, Qwest has no formal limitations that it places on the number of basic or coordinated hot cuts. Generally, Qwest and the CLECs pre-plan to ensure a smooth transition.</p> <p>Batch Hot Cuts are an additional option over and above standard hot cut volume</p>	<p>a. Will Qwest work with Multiple CLECs in the same central office on the same day if the sum of the CLEC's batches does not exceed 100 lines? (AT&T p. 12)</p> <p>b. Is there a limit on the number of CLECs that can migrate 100 lines in a central office in a day? (AT&T p. 13)</p> <p>How will Qwest deal with multiple CLECs in a single CO? What is the maximum number of Batch Hot Cuts it can do in a single day per CO? (MCI - p. 7, 8)</p> <p>c. How will prioritization be determined so that multiple carriers can submit a Batch Hot Cut while not freezing out non-batched cuts or freezing out particular COs? (Eschelon - p. 14)</p> <p>d. If restrictions are placed on CLECs ability to complete Batch Hot Cuts in any wire center at any time, how will comparable restriction apply to Qwest retail? (Eschelon - p. 14)</p> <p>e. McLeod would like clarification around what the "normal</p>	12/3/2003 OPEN	<p>1/7/2004 - Sub-issues a, b, and c (as identified in the CLEC position column) are CLOSED for AT&T, MCI, Covad & McLeod</p> <p>Sub-issue d - AT&T agrees to close; MCI agrees to close; Covad agrees to close; McLeod agrees to close.</p> <p>Sub-issue e - McLeod agrees to close this sub-issue, but believes it is still open as to the issue of scalability (See SC1 & SC-5) Covad agrees to CLOSE AT&T agrees to CLOSE MCI agrees to CLOSE</p>

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		Restrictions, if any, will be applied in a non-discriminatory manner.	workload" is as well as an understanding of exactly how the new batch hot cut process and the normal workload will be resourced. (McLeod – Forum)		
SC-3	Same CLEC, multiple Collocations in the same CO	So long as conversions are for the same CLEC, CLECs with multiple collocations in the same CO can use the Batch Hot Cut process for such conversions	Will Qwest allow CLECs that had two different collocation arrangements in the same CO to include facilities in each of the arrangements on the same project? (AT&T p. 13) For the same CLEC with multiple RSID/ZCID how will Qwest handle?	12/3/2003 OPEN - Qwest will take back – the question of whether the process will accommodate the same CLEC/operating entity with multiple RSIDs or ZCIDs and multiple ICAs combining their orders into a batch. 12/10/2003: If a CLEC is operating under multiple ZCIDs, that means that they are operating under multiple ICAs and, therefore, their orders must be handled as separate batches. 12/12/2003 – If a CLEC is operating under a single interconnection agreement but has multiple RCIDs or ZCIDs, their orders must be handled as separate batches. CLOSED – AT&T agrees to close. MCI agrees to close.	12/12/2003 - CLOSED – AT&T agrees to close. MCI agrees to close.
SC-4	Staffed vs. Un-staffed COs	The Batch Hot Cut process will be available in any central office, whether staffed or un-staffed.	Are batch projects limited to central offices with full-time staff? (AT&T p. 13)	CLOSED – AT&T agrees to close this issue. – Rick Wolters	CLOSED – AT&T agrees to close this issue. – Rick Wolters
SC-5 (See also SC-1)	Staffing levels	Resources will be added and/or shifted as the final Batch Hot Cut process requires. Qwest will	Describe the number of additional people Qwest must add to meet the increased hot cut demand. (AT&T	12/3/2003 OPEN – See also SC-1	1/7/2004 – IMPASSE as to level of detail required regarding plans for staffing

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		use its standard recruiting, hiring and training practices to staff the work activities required. In those locations where Qwest has sufficient volumes, there will be dedicated personnel assigned to batch activities. For other locations, the staff will not be dedicated only to batch work, but during batch activity, will be focused on that work.	p. 13) Plans for recruiting, hiring and training personnel (AT&T p. 14) Qwest must identify and dedicate Qwest personnel to the Batch Hot Cut process (Eschelon – p. 15) By dedicated, Eschelon means resources that will be working solely on batches.		by Qwest to address batch hot cut activity
SC-6	Order accuracy		Qwest should develop a mechanism to create accurate service orders from the batch, and batch hot cut orders should flow-through. (Eschelon – p. 13)	12/3/2003 OPEN 1/8/2004 - Qwest position is that order accuracy is more appropriately dealt with in Long Term PID Administration. 1/8/2004 - AT&T and Covad agree to close this issue and will take up their concerns regarding performance metrics in other sections of the Disputed Issues matrix.	1/7/2004 – MCI agrees to CLOSE this issue. 1/7/2004 – AT&T is willing to close as to SC-6. 1/7/2004 – Covad agrees to close 1/7/2004 – McLeod agrees to close
VOLUMES					
V-1 (See SC-1 & SC-5)	The basis on which Commissions can arrive at a maximum volume of hot cuts to be performed across the Qwest region	Qwest proposed formulas provide the basis on which Commissions can arrive at maximum volumes.	Qwest's proposed formulas do not account for churn and winback activity. The Number should be broken out on a state-by-state basis. (AT&T – p. 13)	12/3/2003 - OPEN - See SC-1 1/8/2004 – McLeod position is that the formula covers the embedded base, but does not account for new growth 1/8/2004 – MCI position is that the formula assumes that the movement will occur over a 21 month period – and does	1/8/2004 – Parties agree to CLOSE this Issue as it is covered in Issues SC-1 and SC-5.

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				<p>not account for the situation where a CLEC may want to move faster than the 21 month period. Further, it appears that the formula is completely dependent on the successful negotiation of a transition plan. There may also be certain central offices where the CLECs may want to move more quickly that may conflict with the 21 month time period as Qwest has proposed.</p> <p>1/8/2004 – Covad cannot say that it agrees completely, but is encouraged that Qwest's numbers appear to show that Qwest has sufficient resources to handle the volumes. The assumptions appear reasonable.</p> <p>1/8/2004 – Qwest can add to its assumptions the "net add" of the current UNE-Loop activity to reflect the growth. With that addition, McLeod would agree that the assumptions are appropriate.</p> <p>MCI would agree that the calculations are correct based on the assumptions. MCI does not believe that the conclusions Qwest is drawing from those numbers is necessarily correct.</p>	
V-2	Per Central Office limit on Batch Hot Cuts	Qwest proposes a limit of 100 lines per Central office	What is the appropriate limit on a per central office basis – should there be a limit? (Eschelon – Forum)	<p>12/3/2003 - OPEN</p> <p>1/8/2004 – Qwest position is that the most efficient configuration is for 2 technicians performing 100 conversions during an 8-</p>	1/8/2004 - MCI would agree to CLOSE this issue based on an agreement that the parties are not foreclosed from mutually

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				<p>hour shift .</p> <p>1/8/2004 – AT&T - accepting that premise – is there a reason why you have to limit it to two technicians? Qwest Response: two technicians is optimum given the concentration of wires on the frames where this work is being performed and is the most efficient way. Further, the 100 lines per CO permits Qwest to complete the migration well within the transition period.</p> <p>1/8/2004 – If, in the transition meetings, MCI or other CLECs want a more rapid transition in certain central offices that met certain characteristics, would Qwest be willing to do more than 100 lines?</p> <p>1/8/2004 - Qwest is not precluding that sort of discussion, however, the volumes appear to demonstrate that Qwest can handle the transition in addition to day-to-day activity within the 100 line per CO limit.</p>	<p>agreeing, during the transition planning process for the embedded base, to the possibility of doing more than 100 lines per CO on an exception basis. Further, planning can include new customers may also be included in the batch.</p> <p>1/8/2004 -- McLeod will go to IMPASSE at this time on the sizing limitation of the number of batch hot cut lines included in a batch per central office. McLeod suggests we take a look at the resources available in a CO and proposes a 200 lines per CO limit.</p> <p>1/8/2004- Covad agrees to CLOSE this issue based on an agreement that the parties are not foreclosed from mutually agreeing, during the transition planning process for the embedded base, to the possibility of doing more than 100 lines per CO on an exception basis. Further, planning process may also include</p>
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					consideration of new acquisition customers. 1/8/2004 - AT&T will take this issue to IMPASSE and supports McLeod's suggestion that the batch size per Central Office of 200 lines.
V-3	Size of a "batch"	The batch must include at least 25 lines for a specific CLEC in one central office.	<p>CLECs should be allowed to determine a minimum or maximum amount of orders to send per batch, per CO. (MCI - p.7)</p> <p>Qwest should specify the assumptions and exceptions made per batch. (Types of orders, volume limits, etc) (McLeod - p. 1)</p> <p>Clarify definition of batch/number of lines. (Eschelon - Forum)</p> <p>How many current orders would trigger the "batch" process as defined in the proposal. In other words, how often does a single CLEC submit orders for 25 mass market loops in a single wire center on a single day? Single week? What percentage of the offices in the state incur this type of volume? (Peter Healy TDS Metrocom - Forum)</p>	<p>12/3/2003 - OPEN</p> <p>12/10/2003 - Qwest does not currently track orders in this manner, and has no way of tracking this information since CLECs do not currently "batch" their orders for submission, except where they desire conversion on a project-managed basis.</p> <p>12/12/2003 - Qwest has UNE-P arrangements in 91% of the central offices in its territory. In a large</p>	<p>1/8/2004 - IMPASSE as to the issue of minimum batch size</p> <p>1/8/2004 - McLeod position is that, particularly for new customers, there should be no minimum number necessary for CLECs to be able to take advantage of batch hot cuts and a cheaper price.</p> <p>1/8/2004 - AT&T position is that 25 should not be the minimum batch size. AT&T proposes there be no minimum batch size</p> <p>1/8/2004 - MCI position is there should be no minimum batch size per CLEC or generally</p>

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			<p>12/19/2003 - MCI response -- MCI position is that limit of 100 per CLEC per CO is the <i>minimum</i> limit.</p>	<p>percentage of those offices there are 25 or more UNE-P arrangements. Qwest will take back question of what is that percentage.</p> <p>12/19/2003 -- generic example in a state with 130 offices, 75 have UNE-P in them; of that 75, less than 25% of them have fewer than 25 UNE-P arrangements, 6 offices have 1,000 or more. Qwest will provide more detail at the January forum.</p> <p>Steve Pitterle - from TDS Metrocom has additional questions before agreeing to close. 12/19/2003 --looking for response from Qwest regarding the percentage requested above.</p> <p>MCI is not willing to agree to close at this time. MCI is not willing to say that the appropriate maximum number of lines per CO is 100 unless there is some actual, technical explanation as to why there is a limit.</p> <p>MCI will take back the question of what MCI's proposed minimum/maximum numbers are for this purpose.</p> <p>McLeod will take back the question of what McLeod's proposed minimum/maximum numbers are for this purpose.</p>	
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				Qwest will take back the request for additional support behind Qwest's 100 batch limit and the CLEC proposal to require less than a 25 minimum number as it pertains to unstaffed offices	
V-4	"Orders" vs. "Lines" when addressing sizing	The batch process will include up to 100 <u>lines</u> per day in a single central office.	Clarify which will be used when sizing and addressing Batch Hot Cut limitations -- lines or orders. (MCI - p. 8)	CLOSED	12/3/2003 - CLOSED
SEAMLESSNESS					
S-1 (See also P-23 & P-26)	How will Qwest manage customer service impacts and outages during batch hot cut process?	See P-23 - P-26	<p>a. Outages must be managed quickly and efficiently (AT&T - p. 5)</p> <p>Identify steps that will be taken to minimize adverse end user impacts. Are there preventative measures contemplated? (Eschelon MN - p. 4 & p. 10) By outage, McLeod is referring to both those instances when customers are unable to receive calls and those instances when customers have no dial tone. (McLeod - 12/19/2003 Forum)</p> <p>b. Provide a response to AT&T's request for e-mail notification on initiation of a batch. (Finnegan - AT&T - Forum)</p>	<p>12/3/2003 - OPEN - See also P-23 and P-26</p> <p>1/8/2004 - Qwest's new proposed status tool would provide CLECs with status on their orders thereby permitting the CLECs to complete the orders or, should they need to pull orders from the batch for some reason, the status tool provides a hot-link e-mail address that CLECs can use to send such a request to Qwest. CLECs also have the existing escalation process available to resolve issues as well.</p> <p>12/3/2003 - OPEN</p> <p>12/10/2003 - Qwest has considered</p>	<p>Sub-Issue S-1a - CLOSED McLeod, MCI, AT&T & Covad agree to close.</p> <p>Sub-Issue S1b - CLOSED McLeod, MCI, AT&T & Covad agree to close.</p>

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				<p>AT&T's request and agrees that it will now provide CLECs with an email notification on the initiation of the batch.</p> <p>12/19/2003 – From AT&T's perspective, believe that with response above and discussion during 12/19/2003 Forum AT&T believes there is agreement in principle. Parties understand that, similar to the process followed during the 271 workshops, agreements reached during the Forum will ultimately be documented in SGAT and, once it has gone through the CMP, in PCAT language.</p> <p>1/7/2004 AT&T position is that it is still investigating the Trap and Trace proposal of Qwest and still questions whether a web-based status tool is sufficient to provide information to the CLECs on status or is an e-mail or other type of "push" technology appropriate. Parties will discuss this issue in the context of Issues P-23 & P-24 and so this Issue can be closed.</p>	
S-2	Interval for the batch – from CLEC initiation of a request to due date for the batch	Intervals for the embedded base of UNE-P depends on the Batch Hot Cut process agreed to in the Forum and the transition plans ordered by the Commission. For new Batch Hot Cuts, the interval	a. Batch Hot Cut intervals cannot be individually negotiated on a project-by-project basis. There must be a standard interval (e.g., 6 days). (AT&T – p. 14)	<p>As to Sub-Issue S-2a (as noted in CLEC position column):</p> <p>12/3/2003 - OPEN - Qwest will take back – parameters for an interval and also whether or not there is a way to schedule without requiring negotiations</p>	1/8/2004 – IMPASSE as to the issue S-2a - parameters for the interval - should the intervals for the batch hot cut process be the same as the intervals for the

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		will be negotiated.	<p>a. CLECs should not be required to "negotiate" the provisioning date for a Batch Hot Cut in advance. Interval should be five (5) business days to minimize the amount of time a customer is held in a limbo state. (MCI – p. 5, 6 & 11)</p> <p>a. Assumption is that the current 5-day interval will be the interval for the new Batch Hot Cut process (McLeod – pp. 1 & 2)</p> <p>a. Eschelon wants definition on what the interval is for the batch hot cut process. For new hot cuts, a standard interval critical. (Eschelon – Forum)</p> <p>b. AT&T wants to "get out of the negotiation business." For transition of the embedded base AT&T suggests scheduling it out every day for weeks at a time. If it is done that way, and Qwest has all the "CLEC balls in the air" and is scheduling the work accordingly, is there still a need for negotiation? (AT&T – Forum)</p> <p>b. Rather than make negotiation the rule, may be easier to have negotiation as the exception for</p>	<p>1/8/2004 – Qwest position is that the "meaningful opportunity to compete" standard as decided in the 271 proceedings should be the basis on which intervals are set. For Batch cuts for the embedded base, the volumes involved and the fact that CLECs already have the customer so there is not a customer acquisition issue, the 7-day interval is appropriate and meets the "meaningful opportunity to compete standard."</p> <p>1/8/2004 – AT&T wants interval for the Batch process to be same as for the one-by-one hot cuts (5 business days). With no minimum batch size, this is consistent. Conditional upon cost.</p> <p>1/8/2004 – McLeod position is that a 4-5 business day interval is appropriate. CLECs have committed to have their translations complete on Day 1 and McLeod would commit to have any defective CFAs supplemented by Day 3. Interval is conditional upon cost.</p> <p>1/8/2004 – Covad is not prepared at this time to specify an interval – tentatively 6 days. Interval is conditional upon cost</p> <p>1/8/2004 – MCI position is that 5 business day interval is appropriate. MCI would also agree to have any defective</p>	<p>standard provisioning process?</p> <p>1/8/2004 – CLOSED as to Issue S-2b – based on Qwest commitment to a scheduling tool. AT&T, MCI, McLeod, Covad agree to close.</p> <p>1/8/2004 – S-2c – IMPASSE – as to the issue of a different batch interval for new customers vs. embedded base customers</p> <p>1/8/2004 – S-2d – CLOSED</p> <p>1/8/2004 – S-2e CLOSED</p>
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			<p>both the embedded base and "new" customers. (AT&T – Forum)</p> <p>c. For CLEC new acquisition customers coming from Qwest to the CLEC, today on average for a residential customer McLeod can convert to McLeod service in 7-8 calendar days, primarily because of the 5 day Qwest interval for the UNE-Loop. Concern about whether the batch hot cut process is even a viable option for "new" customers. (McLeod – Forum)</p> <p>d. MCI wants a timeline containing the intervals and what happens when. (MCI – Forum)</p> <p>e. MCI also wants Qwest to consider development of a scheduling tool. (MCI – Forum)</p>	<p>CFAs supplemented by Day 3. Interval is conditional upon cost</p> <p>Sub-Issue S-2c 12/12/2003 Qwest will take back issue of whether there could be a different interval for "new customers" vs. embedded base.</p> <p>1/8/2004 – Qwest is not willing to have a different interval for "new customers" vs. embedded base.</p>	
S-3 (See also Q-2)	Responsibility for issuing LNP Order		<p>Qwest should issue the LNP order when the cut is complete and provide immediate notification to the CLEC when it occurs. (MCI – p. 13)</p>	<p>12/3/2003 OPEN</p> <p>1/8/2004 – See related issue Q-2. Qwest is not willing to perform LNP porting activity for the CLEC. Qwest is proposing CLECs use the web-based status tool and Trap & Trace capability to identify when hot cut activity is completed so that they can submit their own number port activation to the NPAC.</p>	<p>1/8/2004 – CLOSED – AT&T, MCI, Covad & McLeod agree to close.</p>

RATES/PRICE

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R-1 (See also R-2)	Rate structure for new batch process and timing for development of the structure	The final Batch Hot Cut process must be defined before Qwest can create an appropriate cost study. The proposed Batch Hot Cut Process does not include costs associated with Coordinated Installation.	Detailed rate information needs to be provided including the cost structure and cost studies used to develop the rate (AT&T - p. 3); (MCI - p. 3). Consideration of rates for coordinated installation. (Eschelon - p. 11) What are the benefits of the new process? How are efficiencies quantified in Qwest's proposed process (AT&T & MCI - Forum)	12/3/2003 OPEN 1/8/2004 - Given the changes made to the process during the Forum - Qwest will need to incorporate the changes into its cost studies for the process as it now stands. Qwest plans on filing a cost study with its testimony based on Qwest's proposal as it exists today along with a recommended price based on that study.	1/8/2004 - See also R-2 - IMPASSE as to what is the appropriate rate structure
R-2 (See also R-1)	What is the appropriate TELRIC-based price for the Batch Hot Cut process?	The NRC for the Batch Hot Cut process should reflect the forward-looking cost Qwest will actually incur to provide Batch Hot Cuts. The proposed process, as currently designed realizes efficiencies gained as a result of performing work in a batch manner.	Qwest needs to make significant reductions in its hot cut NRCs to make UNE-L a viable alternative for serving mass market (AT&T - p. 4) Qwest must specifically quantify all proposed NRCs involved in the Batch Hot Cut process. (McLeod - p. 1)	12/3/2003 OPEN - 1/8/2004 - see discussion in "History Column for Issue R-1 above.	1/8/2004 - See also Issue R-1 - IMPASSE - as to what is the appropriate TELRIC-based rate.
POST-CUT QUALITY					
Q-1 (See S-1)	Is there a process to "throw-back" a customer to its prior service	Qwest will send CLEC an electronic spreadsheet on the due date after the hot cuts have been completed. The spreadsheet will contain a deadline time when Qwest will begin running its completions out of the WFA/C system. If the CLECs identify issues with their lines, CLECs	There should be such a process. (AT&T - p. 20) (Eschelon - p. 14) (McLeod - p. 2) (MCI - p. 11)	12/3/2003 OPEN 1/8/2004 - parties agree this issue is addressed in Issue S-1	1/8/2004 - CLOSED - MCI, AT&T, McLeod & Covad agree to close as this issue is addressed in Issue S-1

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		will contact the QCCC before the deadline set. Then the order would stop, it would be cut back to the Qwest switch. translations would not run and Qwest would send a jeopardy notice to the CLEC. CLEC would then supplement the order and follow the standard hot cut process.	If there does happen to be a degradation of service associated with going from UNE-P to UNE-L, if there is no longer a UNE-P option, what then? (McLeod - Forum) Auto Completions from WFA - is it done in batches or by individual orders? (Clauson - Eschelon - Forum)	12/10/2003: Order automation checks for completions in WFA every 3 minutes and issues a request to the SOP to do completions. 12/12/2003 - CLOSED as to Eschelon's issue regarding WFA auto completions.	
Q-2 (See also S-3)	LNP activity	Qwest sets LNP triggers prior to the due date. CLEC subscription activity triggers the porting.	Qwest must submit the number-port activation order to NPAC within 10 minutes after the Batch Hot Cut is completed, with notice to the CLEC after successful completion of each step. (MCI - p. 12-13)	12/3/2003 OPEN - See also S-3 1/8/2004 - Qwest is not willing to perform LNP porting activity for the CLEC. Qwest is proposing CLECs use the web-based status tool and Trap & Trace capability to identify when hot cut activity is completed so that they can submit their own number port activation to the NPAC.	1/8/2004 - CLOSED. AT&T, MCI, Covad & McLeod agree to close.
PROCESS TESTING/PERFORMANCE MEASURES					
T-1	Should Qwest provide some demonstrable method to show that the Batch Hot Cut process works.	No. There is no such requirement in the TRO. The State Commissions shall establish and implement a batch hot cut process by July, 2004. Development of a test and	Process must be thoroughly tested to guarantee operational readiness. (AT&T - p. 21) AT&T recommends that there be some sort of testing process that uses existing Qwest customers,	12/3/2003 OPEN - OPEN - Qwest will take back - possibility of proposing some demonstrable vehicle/evidence to show that the process works.	1/8/2004 - IMPASSE as to the issue of whether there is a requirement for Qwest to provide demonstrable proof that its proposed Batch Hot Cut process works prior to state commission approval.

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		<p>incorporating a test as AT&T envisions takes an extensive amount of time that the timeframes provided by the FCC do not provide.</p>	<p>subject to monitoring by the State Commissions. (AT&T)</p> <p>The test would have Qwest become a CLEC in its own territory establish a collocation, insert the required equipment, backhaul to a second CO, where it would have the backhaul connected to the second switch. Test would use Qwest's existing retail customers, and would test the 911 process, the LNP process etc. As the test was performed, there could be independent observations by the State Staffs to see how Qwest is performing. (AT&T – Forum)</p> <p>Subject to further discussion, expect that it would provide 100 cuts per day for a series of days. (AT&T – Forum)</p> <p>Qwest would have to send orders to itself via the GUI. (AT&T – Forum)</p> <p>The test does not have to be set up and completed prior to implementation of the process. The State Commissions can approve and implement the process and then perform the test. (AT&T)</p>	<p>12/19/2003 – Closed as to Rick Carter of the Oregon PUC question as to whether there a current work operation that could simulate a Batch Hot Cut that would illustrate Qwest's competency in this type of activity e.g., existing hot cut process bulk cuts to DLC etc.</p> <p>Qwest will take back – suggestions made by Don Gray from the Nebraska Commission and Rick Carter from the Oregon Commission regarding alternatives to testing e.g., PROCESS metrics</p> <p>12/10/2003: Response to Don Gray (Nebraska Commission) suggestion regarding documentation of training and proficiency technicians and others involved in the batch hot cut process: Qwest is committed to training its affected workforce once the BHC process is finalized to ensure that technicians are proficient in the activities required by the process.</p>	
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			<p>– Forum)</p> <p>AT&T doesn't think the system or process will be the problem – the problem will be that you have a lot of human touch-points that create the opportunity for error. AT&T wants to see volumes of the level that could be expected with the process and some way to show that the process works under those volumes</p> <p>AT&T believes it is appropriate to test the actual process – once the process is developed – it should go through the test. As to the notion that there is something out there today that is a proxy – AT&T doesn't want to pursue that. Not suggesting that the testing has to be a part of any process proposal that the Commissions will approve – it can be done serially after the Commissions have issued their decisions. (AT&T 12/19/2003 Forum)</p> <p>Commercial testing must be an integral part of any approval process. (MCI – pp. 5 & 6)</p> <p>MCI does not believe a third party</p>		
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			<p>test is required. There must be metrics put in place and the commercial operation with the ability to look at performance and with distinct performance metrics and remedies is the way to go. It is commercial day-to-day activity that is monitored and that there are sanctions/penalties for non-performance. (MCI – Forum)</p> <p>MCI concerned that the ancillary processes that surround the batch hot cut process can handle the volumes that a batch process may bring about. Not something within the control of Qwest, however, will be an issue that may directly impact customers. So MCI believes must work through the process, the process must be measurable and then see what happens in the commercial world once the process is implemented. If there are problems that are impacting end-user customers, there must be a way to stop the process until the issues are addressed. (MCI – Forum)</p> <p>Process must be tested prior to implementation. (Eschelon – p. 16)</p>		
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			<p>Eschelon is interested in getting more information regarding AT&T's testing proposal using Qwest retail customers. (Eschelon – Forum)</p> <p>Qwest should be required to test any proposed Batch Hot Cut process before a Commission makes a finding on whether CLECs are impaired in switching mass-market customers. Qwest must also ensure that associated vendors (numbering administrator, E911 administrator, etc.) can handle any increased loads. (McLeod – p. 2)</p>		
T-2	Performance measures for new Batch Hot Cut process	<p>Long Term PID Administration is the appropriate forum to develop new performance measures associated with the Batch Hot Cut process. Further, there is not the same 9-month deadline associated with developing performance measures.</p> <p>12/3/2003 - Qwest would be willing to discuss Process Measures – but these are different than Performance Measures.</p> <p>12/19/2003 - Specifically as to</p>	<p>Performance measures should be developed simultaneously with the process to permit Qwest's performance to be evaluated. (Eschelon – p. 15); MCI – p. 9.</p> <p>Need to have basic metrics and sanctions in place when the process is implemented. Eschelon cautions against delay in development of the metrics. (Eschelon – Forum)</p> <p>Metrics need to be incorporated into the various state PAPs. PIDs must be developed in parallel with the process development. (AT&T</p>	<p>12/3/2003 OPEN - Qwest will take back -- providing PROCESS metrics that will be incorporated into the process (Per request of Don Gray)</p> <p>Qwest will take back – identifying those PIDS that apply to the activities associated with the proposed Batch Hot Cut process as well as those that do not apply. (MCI Request)</p> <p>12/10/2003: Qwest would be willing to work with the Long Term PID Administration (LTPA) facilitator, state commission staff members and CLECs to facilitate expeditious completion of BHC PID development in LTPA once the</p>	<p>1/8/2004 – McLeod recommends the issue be CLOSED with the understanding that the issue was whether there are measures in place today that can be used, with further measures to be developed in the Long Term PID Administration once the process is finalized.</p> <p>AT&T agrees to CLOSE based on the above understanding.</p>

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		<p>the MCI request – the PIDs that impact analog loop provisioning and repair processes are publicly available. Which metrics will be impacted by the Batch Hot Cut process as well as those that need to be developed for the Batch Hot Cut Process is more appropriately addressed by those experts in the LTPA</p> <p>Qwest is not willing to provide the PIDs for discussion in this Forum – the appropriate place for discussion and development is the LTPA.</p>	<p>-- Forum)</p> <p>Measure of things like how many order rejected for CFA or customer losing service on the day of the cut or how many cuts done per day.</p> <p>Need a description of the metrics or measurements relating to the accuracy and seamlessness of LNP transactions. (MCI – p. 10)</p> <p>MCI requests that Qwest provide the current PIDs that do apply to the Batch Hot Cut Process and any PIDs that you think do not apply to the Batch, but do apply to Basic or Coordinated or other installation methods.</p> <p>12/19/2003 – Forum - AT&T believes that all existing PIDs, with the exception of OP-4 and OP-13, would apply to the Batch Hot Cut process.</p>	<p>Batch Hot Cut Process is complete.</p> <p>12/19/2003 – OPEN --as to MCI issue regarding identifying those existing PIDs that apply to the Batch Hot Cut process. Based on discussion during the 12/19/2003 Forum, MCI will take back the Action Item to provide a response regarding its position on the appropriate forum for development of Performance Measures during January face-to-face Forum.</p> <p>1/8/2004 – Qwest has committed to support having development of BHC metrics being made a high priority in the Long Term PID Administration. Further, for those PIDs that are not modified, then Batch Hot Cut activity will be included in those measures e.g., analog loop measures. Finally, process oversight exists today that evaluates any problems that may arise to determine the cause and takes steps necessary to rectify the problem to improve the process.</p> <p>In today's world, with no batch hot cut exclusions, which PIDs would cover batch hot cut activity? If you look at general analog loop provisioning PIDs at the very least, OP-4 and OP-13 would not apply to batch hot cut activity. If you look at what the FCC focuses on it is commitments met and new installation service quality. Those PIDs would capture batch hot cut activity.</p>	<p>MCI agrees to CLOSE based on the above understanding.</p> <p>Covad agrees to CLOSE based on the above understanding.</p>
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BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF IMPLEMENTATION
OF A BATCH CUT PROCESS**

Case No. 03-00403-UT

And

**IN THE MATTER OF IMPAIRMENT
IN ACCESS TO LOCAL CIRCUIT
SWITCHING FOR MASS MARKET
CUSTOMERS**

Case No. 03-00404-UT

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **NOTICE OF FILING BATCH HOT CUT FORUM FINAL ISSUES MATRIX** to be mailed and/or hand-delivered on January 15, 2004 to the following:

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